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Attorneys for Defendant  
Mr. Garcia

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	) Case No. 2:20-cr-181-JAM
Plaintiff,	)
vs.	) <b>STIPULATION AND ORDER TO CONTINUE</b>
	) <b>STATUS CONFERENCE AND EXCLUDE TIME</b>
MICHAEL GARCIA, et al.	) Date: February 8, 2022
Defendants.	) Time: 9:30 a.m.
	) Judge: Hon. John A. Mendez

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Adrian Kinsella, counsel for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Michael Garcia; and Michael D. Long, counsel for Nancy Garcia that the status hearing currently set for February 8, 2022 at 9:30 be continued to April 26, 2021 at 9:30 a.m.

The parties specifically stipulate as follows:

1. Mr. and Ms. Garcia are the only defendants in the instant matter with pending charges against them. Co-defendant Gonzalo Ruiz Garcia has had all charges dismissed against him. Co-defendant Tylor Combs has pleaded guilty and been sentenced.

2. By previous order, this matter was set for a status on February 8, 2022 at 9:30 a.m.
3. By stipulation, Mr. Garcia now moves to continue the status conference to April 26, 2022 at 9:30 a.m.
4. The government has produced roughly 2,000 pages and various video and audio recordings in discovery.
5. Mr. Garcia requires additional time to review the discovery, investigate and research possible defenses, research potential pretrial motions, and explore potential resolutions to the case, and otherwise prepare for trial. Prior defense counsel for Mr. Garcia, Lexi Negin, recently retired. New defense counsel for Mr. Garcia, Hootan Baigmohammadi, needs additional time to familiarize himself with the case.
6. Mr. Garcia believes that failure to grant the requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
7. Neither the government nor Ms. Garcia object to the continuance.
8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between February 8, 2022 and April 26, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public, Mr. Garcia, and Ms. Garcia in a speedy trial.

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Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: February 2, 2022

/s/ Hootan Baigmohammadi  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Mr. Garcia

Date: February 2, 2022

/s/ Michael D. Long  
Michael D. Long  
Attorney for Ms. Garcia

Date: February 2, 2022

PHILLIP A. TALBERT  
United States Attorney

/s/ Adrian Kinsella  
Adrian Kinsella  
Assistant United States Attorney  
Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

DATED: February 3, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE